

EXHIBIT A

Compensation by Matter – Ninth Monthly Compensation Period

Matter	Total Hours	Total Fees
CA Department of Business Oversight	89.9	\$72,857.25
General Business Advice	5.4	\$4,137.50
People v. Lear Capital – Insurance	2.8	\$2,450.00
Project Phoenix	No charge	No charge
Respond to Blalock v. Halt Subpoena	0.1	\$87.50
Totals:	98.2	\$79,532.25

Timekeeper Summary – Ninth Monthly Compensation Period

Timekeeper	Position	Rate	Hours	Amount
Seth E. Pierce	Member of the CA Bar since 1996; Partner in Litigation Dept. since 2005	\$875	84.50	\$70,043.75
Jeffrey Davine	Member of the CA Bar since 1985; Partner in the Tax Dept. since 2002	\$810	1.30	\$1,053.00
Brad Mullins	Member of the NY (2012), NJ (2012), and CA (2010) Bars; Partner in Litigation Dept. since 2019	\$750	10.50	\$7,875.00
Nicole Williams	Paralegal in Litigation Dept. since 2003	\$295	1.90	\$560.50
Total			98.20	\$79,532.25
Blended Rate \$809.90				



MITCHELL SILBERBERG & KNUPP LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Lear Capital, Inc.
Kevin DeMeritt, President
1990 S. Bundy Drive, Suite 600
Los Angeles, CA 90025
Attn.: John Ohanesian
J_Ohanesian@learcapital.com

Atty No.: 00083
Client ID: 40203
Invoice: 464719

March 29, 2023

LEGAL SERVICES RENDERED through February 28, 2023

Re: General Business Advice	4,137.50	\$4,137.50
Re: People v. Lear Capital – Insurance Coverage	2,450.00	\$2,450.00
Re: Respond to Blalock v. Halt Subpoena	87.50	\$87.50
Re: Project Phoenix	0.00	\$0.00
Subtotal:		6,675.00
Prior balance forward:	38,864.00	
Less payments:	0.00	
Prior balance due:		38,864.00
TOTAL DUE:		\$45,539.00

Outstanding Invoice (s):	Date	Invoice	Amount
	04/22/22	449473	2,689.00
	01/19/23	461619	11,711.00



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Outstanding Invoice (s):	Date	Invoice	Amount
	02/20/23	462907	24,464.00

cc: Kevin DeMeritt
via e-mail: k_demeritt@learcapital.com



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 March 29, 2023
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General Business Advice

Fees through February 28, 2023:

02/03/23	Finalize referral agreement (.2); call with K. DeMeritt regarding same (.2); revise agreement (.1).	B. MULLINS	0.50	375.00
02/07/23	Review competitor website per K. DeMeritt request and provide feedback/advice regarding same (.6).	S. PIERCE	0.60	525.00
02/21/23	Email correspondence with J. Ohanesian and internally regarding vendor agreement (.1).	S. PIERCE	0.10	87.50
02/24/23	Emails with S. Pierce/J. Ohanesian regarding vendor agreement (.2).	B. MULLINS	0.20	150.00
02/25/23	Begin review of proposed vendor agreement (.7).	B. MULLINS	0.70	525.00
02/26/23	Review and provide comments on various vendor agreements (2.3).	B. MULLINS	2.30	1,725.00
02/27/23	Call with J. Ohanesian regarding revisions to vendor agreements (.4); revise and finalize vendor agreements (.6).	B. MULLINS	1.00	750.00

Total Fees:

\$4,137.50



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Billing Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
S. PIERCE	0.70 hours at	\$875.00 =	612.50
B. MULLINS	4.70 hours at	\$750.00 =	3,525.00
 SUMMARY TOTALS	 5.40		 4,137.50



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People v. Lear Capital – Insurance Coverage

Fees through February 28, 2023:

02/02/23	Videoconference with P. Cook and K. DeMeritt regarding Argo policy and related issues (.9).	S. PIERCE	0.90	787.50
02/03/23	Email correspondence to P. Cook with requested information (.3).	S. PIERCE	0.30	262.50
02/07/23	Provide requested feedback and information to P. Cook and telephone conference with same (.6).	S. PIERCE	0.60	525.00
02/14/23	Telephone conference with P. Cook (.3).	S. PIERCE	0.30	262.50
02/24/23	Review claim denial letter and related email correspondence with P. Cook (.2) and follow-up analysis (.5).	S. PIERCE	0.70	612.50

Total Fees:	\$2,450.00
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Billing Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
S. PIERCE	2.80 hours at	\$875.00 =	2,450.00
SUMMARY TOTALS	2.80		2,450.00



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Respond to Blalock v. Halt Subpoena

Fees through February 28, 2023:

02/02/23	Review third party trial subpoena and objection and related email correspondence (.1).	S. PIERCE	0.10	87.50
Total Fees:				<hr/> \$87.50

Billing Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
S. PIERCE	0.10 hours at	\$875.00 =	87.50
SUMMARY TOTALS	0.10		87.50



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Project Phoenix

Fees through February 28, 2023:

02/23/23	Review fee application (.2 - N/C).	S. PIERCE	0.20 NO CHARGE
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March 29, 2023

REMITTANCE

(please include with payment)

Current Fees:	6,675.00
Current Disbursements:	0.00
Total Current Charges - This Invoice:	\$6,675.00
Prior balance due:	38,864.00
TOTAL DUE:	\$45,539.00

Please remit to:

Mitchell Silberberg & Knupp LLP
2049 Century Park East, 18th Floor
Los Angeles, CA 90067

Wire/ACH Transfer Instructions:

Routing Number or ABA: [REDACTED]
Bank Name: Wells Fargo Bank, N.A.
Bank Address: 420 Montgomery, San Francisco, CA 94104
Beneficiary Account No.: [REDACTED]
Beneficiary Account Name: Mitchell Silberberg & Knupp LLP
For International Transfers for payments in USD: [REDACTED]
For International Transfers for payments in currencies other than USD: [REDACTED]
For payment inquiries please e-mail payment@msk.com

*** Please Include Invoice Number with Payment ***

Note that MSK will not change its banking information without prior notice on our bills. All MSK emails originate from a [3 initials]@msk.com address. Phishing and fraud attempts are common, especially those requesting that you send payment to a new account that does not match our bills. Please don't hesitate to call if you ever have any doubt about the authenticity of any communication.



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Atty No.: 00311
Client ID: 40203-
NASAA
Invoice: 464720

March 29, 2023

LEGAL SERVICES RENDERED through February 28, 2023

Re: CA Department of Business Oversight Subpoena Response	72,857.25	\$72,857.25
		<hr/>
Subtotal:		72,857.25
Prior balance forward:	30,236.68	
Less payments:	0.00	
Prior balance due:		30,236.68
		<hr/>
TOTAL DUE:		\$103,093.93

Outstanding Invoice (s):	Date	Invoice	Amount
	04/22/22	449475	1,587.68
	01/19/23	461622	3,674.00
	02/20/23	462909	24,975.00

cc: Kevin DeMeritt
via e-mail: k_demeritt@learcapital.com



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March 29, 2023
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CA Department of Business Oversight
Subpoena Response

Fees through February 28, 2023:

02/01/23	Prepare (.9) for and videoconference with State representatives (1.0) regarding counter proposal; follow-up with A. Friedman (.2); telephone conference with K. DeMeritt regarding same (.2).	S. PIERCE	2.30	2,012.50
02/07/23	Assist in settlement negotiations, including preparation of materials for transmission to M. Brauer and telephone conference with M. Brauer (2.8)	S. PIERCE	2.80	2,450.00
02/08/23	Advise regarding settlement negotiations (3.2); attend bankruptcy hearing (.5).	S. PIERCE	3.70	3,237.50
02/09/23	Videoconferences and email correspondence regarding potential settlement and proposed terms, including potential mediation options (1.7).	S. PIERCE	1.70	1,487.50
02/10/23	Advise regarding settlement negotiations (.5).	S. PIERCE	0.50	437.50
02/13/23	Attend strategy call related to potential settlement (1.0); call with S. Pierce regarding mediation brief (.2).	B. MULLINS	1.20	900.00
02/13/23	Advise regarding settlement negotiations, including multiple videoconferences with team (4.1).	S. PIERCE	4.10	3,587.50



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02/14/23	Advise regarding settlement negotiations, attend hearing with Court regarding mediation, and prepare response to settlement related discovery requests (5.4).	S. PIERCE	5.40	4,725.00
02/15/23	Gather information for mediation brief (1.9).	N. WILLIAMS	1.90	560.50
02/15/23	Advise regarding settlement negotiations and related discovery requests (3.0).	S. PIERCE	3.00	2,625.00
02/16/23	Prepare for mediation including preparation of mediation brief and videoconference with mediator (8.8); attend discovery hearing (.9)	S. PIERCE	9.70	8,487.50
02/17/23	Prepare for mediation, including draft mediation brief (5.4).	S. PIERCE	5.40	4,725.00
02/18/23	Email correspondence with K. DeMeritt regarding mediation preparations (.2).	S. PIERCE	0.20	175.00
02/19/23	Email correspondence with K. DeMeritt regarding mediation preparations (.1).	S. PIERCE	0.10	87.50
02/20/23	Review mediation presentation and provide comments (.6).	B. MULLINS	0.60	450.00
02/20/23	Prepare mediation brief (5.0), including telephone conference with K. DeMeritt regarding same (.4).	S. PIERCE	5.40	4,725.00



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02/21/23	Review and revise mediation deck, including confirming citations/information (1.2); attend call with bankruptcy team regarding mediation strategy (1.0).	B. MULLINS	2.20	1,650.00
02/21/23	Prepare mediation brief and related teleconference with K. DeMeritt and follow-up with L. Miller (5.3).	S. PIERCE	5.30	4,637.50
02/22/23	Review updated draft of mediation statement (.4); incorporate additional information into mediation deck (.4); begin preparing exhibits to mediation deck (.2).	B. MULLINS	1.00	750.00
02/22/23	Prepare mediation brief (2.4).	S. PIERCE	2.40	2,100.00
02/23/23	Continue pulling information and exhibits for mediation deck (.6); confer with S. Pierce regarding same (.2).	B. MULLINS	0.80	600.00
02/23/23	Prepare mediation brief and related videoconferences/telephone conferences and email correspondence with A. Friedman, P. Cook, and L. Miller (1.5).	S. PIERCE	1.50	1,312.50
02/24/23	Telephone conference with M. Brauer and other NASAA representatives regarding insurance clawback claim and remaining limits (.5) and follow-up preparation for mediation (.2).	S. PIERCE	0.70	612.50
02/26/23	Travel to Nashville for mediation (non-productive time; billed at half rate) (3.5).	S. PIERCE	3.50	1,531.25



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02/26/23	Prepare for mediation, including preparation of non-monetary counterproposal (3.5).	S. PIERCE	3.50	3,062.50
02/27/23	Prepare for and attend mediation (10.2).	S. PIERCE	10.20	8,925.00
02/28/23	Provide tax advice (1099 issue) in connection with potential settlement (1.3).	J. DAVINE	1.30	1,053.00
02/28/23	Return travel from Nashville (following mediation; billed at half rate) (5.4).	S. PIERCE	5.40	2,362.50
02/28/23	Negotiate and advise regarding potential settlement, including telephone conference with K. DeMeritt, others, and drafting of term sheet provisions (4.1).)	S. PIERCE	4.10	3,587.50

Total Fees:

\$72,857.25

Billing Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
S. PIERCE	72.00 hours at	\$875.00 =	63,000.00
J. DAVINE	1.30 hours at	\$810.00 =	1,053.00
B. MULLINS	5.80 hours at	\$750.00 =	4,350.00
S. PIERCE (travel time)	8.90 hours at	\$437.50 =	3,893.75
N. WILLIAMS	1.90 hours at	\$295.00 =	560.50
 SUMMARY TOTALS	 89.90		 72,857.25



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March 29, 2023

REMITTANCE

(please include with payment)

Current Fees:	72,857.25
Current Disbursements:	0.00
Total Current Charges - This Invoice:	\$72,857.25
Prior balance due:	30,236.68
TOTAL DUE:	\$103,093.93

Please remit to:

Mitchell Silberberg & Knupp LLP
2049 Century Park East, 18th Floor
Los Angeles, CA 90067

Wire/ACH Transfer Instructions:

Routing Number or ABA: [REDACTED]
Bank Name: Wells Fargo Bank, N.A.
Bank Address: 420 Montgomery, San Francisco, CA 94104
Beneficiary Account No.: [REDACTED]
Beneficiary Account Name: Mitchell Silberberg & Knupp LLP
For International Transfers for payments in USD: [REDACTED]
For International Transfers for payments in currencies other than USD: [REDACTED]
For payment inquiries please e-mail payment@msk.com

*** Please Include Invoice Number with Payment ***

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